

OFFICES OF FREDERICK P. HAFETZ LLC

ATTORNEYS AT LAW

420 LEXINGTON AVENUE #2818
NEW YORK, N.Y. 10170
TELEPHONE: (212) 997-7400
TELECOPIER: (212) 997-7646

November 1, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: United States v. Gulkarov et al.
22-CR-00020 (PGG)

Dear Judge Gardephe:

I write to respectfully request permission for Alexander Gulkarov to partially join in defendant Roman Israilov's Omnibus Pretrial Motions filed on October 19, 2022 (Dkt. No. 148), set forth in Mr. Israilov's Memorandum of Law in support of his Omnibus Pretrial Motions (Dkt. No. 149).

Specifically, Mr. Gulkarov seeks to join in Mr. Israilov's motion to: (1) suppress the wiretap evidence from the Khaimov phones, as described in Part II of the Israilov Memorandum of Law; and (2) obtain a Court Order for the government to produce all defendants' statements that it intends to introduce at a joint trial, as described in Part III(D) of the Israilov Memorandum of Law.

The government has indicated that it takes no position with respect to this application.

If the Court consents to this request, I respectfully request that Your Honor "So Order" this letter.

Respectfully submitted,


/s/
Noah E. Shelanski

cc: All counsel (via ECF)

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: November 9, 2022